

THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

JANNETTE GONZALEZ CLAUDIO

DEBTOR

CASE NO. 15-09164/ESL

CHAPTER 13

**DEBTOR'S MOTION FOR ADDITIONAL EXTENSION OF TIME  
TO REPLY MOTION TO DISMISS, DOCKET #58**

TO THE HONORABLE COURT:

**NOW COMES, JANNETTE GONZALEZ CLAUDIO**, the Debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On February 15, 2019, this Honorable Court ordered the following:

"The motion filed by DEBTOR requesting extension of time of THIRTY (30) days to reply to the motion to dismiss at docket #58 (docket #60) is hereby granted. Order due by March 18, 2019".

2. The Debtor respectfully submits to this Honorable Court that she needs twenty one (21) additional days to be able to cure the Plan arrears and adequately reply to the Trustee's motion to dismiss, Docket No. 58.

3. Therefore, the Debtor respectfully requests this Honorable Court an additional extension of time of twenty one (21) days in order to adequately response Trustee's motion to dismiss, Docket No. 58. This extension of time to expire on April 9, 2019.

**WHEREFORE**, the Debtor, through the undersigned attorney respectfully requests that for the above stated reasons this Honorable Court grant the requested extension of time.

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Debtors' Motion for Extension of Time  
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**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF filing system which will send notice of same to: the Chapter 13 Trustee; I also certify that a copy of this motion was sent via US Mail to the Debtor to her address of record.

**RESPECTFULLY SUBMITTED**, in San Juan, Puerto Rico, this 19<sup>th</sup> day of March 2019.

**/s/ Roberto Figueroa Carrasquillo**  
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